

JAP:MKP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

ANGELO FERNANDEZ,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

THOMAS WILBERT, being duly sworn, deposes and states that he is a
Special Agent with the United States Department of Homeland Security, Homeland Security
Investigations (“HSI”), duly appointed according to law and acting as such.

On or about April 29, 2016, within the Eastern District of New York and
elsewhere, the defendant ANGELO FERNANDEZ did knowingly, intentionally and
unlawfully import into the United States from a place outside thereof a substance containing
cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent’s information and belief are as follows:¹

1. On or about April 29, 2016, the defendant ANGELO FERNANDEZ
arrived on Jet Blue Flight No. 409 from Santo Domingo, Dominican Republic at JFK
International Airport in Queens, New York.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not
described all the relevant facts and circumstances of which I am aware.

2. Upon his arrival at JFK on or about April 29, 2016, the defendant ANGELO FERNANDEZ was selected for an enforcement examination by United States Customs and Border Protection ("CBP") officers. The defendant presented one laptop computer bag and one rolling suitcase; he acknowledged ownership of both items. A CBP officer noticed the laptop bag had unusually thick panels, and when he probed the bag, he discovered a white powdery substance.

3. ANGELO FERNANDEZ was then brought to a private room where a pat down revealed a thick, bulky area near his groin. It was revealed that ANGELO FERNANDEZ had a sock containing 100 pellets secreted near his groin. One of the pellets was probed revealing a white powdery substance.

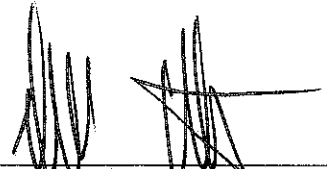
4. The white powdery substances from the laptop bag and from the pellet field-tested positive for cocaine. The total gross weight of the cocaine both in the laptop bag and the pellets is 4.22 kilograms. The defendant was thereafter arrested and HSI was contacted.

5. On or about April 29, 2016, HSI agents then interviewed the defendant ANGELO FERNANDEZ. Before the interview, HSI agents advised the defendant of his Miranda rights, which rights he agreed to waive. The defendant revealed that he knew he was importing narcotics and that he expected to be paid \$15,000. The defendant also admitted to previously transporting narcotics from the Dominican Republic to Puerto Rico, for which he received \$10,000.

WHEREFORE, your deponent respectfully requests that the defendant

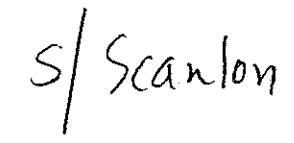
ANGELO FERNANDEZ be dealt with according to law.

Dated: Brooklyn, New York
April 29, 2016



THOMAS WILBERT
Special Agent
Homeland Security Investigations

Sworn to before me this
29th day of April, 2016



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